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9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 KELLY WILSON,
13

14 Plaintiff,

15 vs.

16 THE WALT DISNEY COMPANY, DISNEY
17 ENTERPRISES, INC., WALT DISNEY
18 PICTURES, and WALT DISNEY MOTION
PICTURES GROUP, INC.,

19 Defendants.

Case No. 3:14-cv-01441-VC

**SUPPLEMENTAL DECLARATION OF
ERIN J. COX IN SUPPORT OF
DEFENDANTS' REPLY IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT**

Judge: Hon. Vince G. Chhabria
Date: April 9, 2015
Time: 10:00 a.m.
Ctm: 4

1 I, Erin J. Cox, declare:

2 I am an attorney in the law firm of Munger, Tolles & Olson LLP, counsel of record for
3 Defendants The Walt Disney Company, Disney Enterprises, Inc., Walt Disney Pictures, and Walt
4 Disney Motion Pictures Group, Inc. (collectively, "Defendants") in the above-captioned action. I
5 have personal knowledge of the facts stated in this declaration, and could testify to them
6 competently if called upon to do so. I submit this declaration in support of Defendants' Reply in
7 support of their Motion for Summary Judgment.

8 1. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the
9 transcript of Matt Roberts's deposition in this matter, taken on November 17, 2014.

10 2. Attached hereto as **Exhibit 2** is a true and correct copy of Plaintiff's profile
11 (identification number 10384, created on July 15, 2009) from Walt Disney Animation Studios'
12 candidates database, produced in discovery by Defendants in this matter bearing Bates number
13 WDP_00000129. This document was marked as an exhibit during Mr. Roberts's deposition.

14 3. Attached hereto as **Exhibit 3** is a true and correct copy of an email dated July 15,
15 2009 from Animation.jobs@disneyanimation.com to Kelly Wilson at
16 kellyannewilson@gmail.com, with the subject line "Please activate your new account." This
17 document was produced in discovery by Plaintiff in this matter on a hard drive in the following
18 folder structure: The Snowman Files\Emails\Misc\2009.07.15.pdf.

19 4. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the
20 transcript of Edwin Fabian's deposition in this matter, taken on January 22, 2015, along with the
21 errata sheet to the transcript.

22 5. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the
23 transcript of Elyse Klaidman's deposition in this matter, taken on January 23, 2015.

24 6. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts from the
25 transcript of Paul Brigg's deposition in this matter, taken on January 20, 2015.

26 7. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts from the
27 transcript of Peter Del Vecho's deposition in this matter, taken on October 28, 2014.

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9. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts from the transcript of Maureen Furniss's deposition in this matter, taken on February 27, 2015.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct, and that this declaration was executed on March 26, 2015, at Los Angeles, California.

/s/ Erin J. Cox
ERIN J. COX¹

¹ Electronically signed by Kelly M. Klaus with the concurrence of Erin J. Cox. Civ. L.R. 5-1(i)(3).